

39395 W. Twelve Mile Road, Suite 103 • Farmington Hills, MI 48331 • (877) 633-5520 • Fax: (248) 994-5456

June 18, 2008

George Czerniak USEPA Region 5 Branch Chief Air Enforcement and Compliance Assurance Branch 77 West Jackson Blvd. Chicago, Illinois 60604

Re: Winnebago Reclamation Service

Facility ID No. 201801AAF

Title V - CAAPP Permit No. 99020102

Request for Alternate Compliance Timeline and Notification of Exceedance -

GW191

Project Number 070104

Dear Mr. Czerniak:

Cornerstone Environmental Group, LLC., on behalf of Winnebago Reclamation Service (Winnebago) respectfully submits this request for alternate compliance timeline in accordance with 40 CFR 60.755(a)(5) and a notification of exceedance of operating parameter for landfill gas extraction well GW191.

40 CFR 60.755(a) requires correction of a facility's Landfill Gas Collection and Control System (GCCS) well field operations within 15 days of the initial monitoring event if the data is outside of the allowable operating parameters for pressure, temperature and either oxygen or nitrogen (positive pressure, temperature at or above 131 degrees Fahrenheit or oxygen readings of 5 percent or more/nitrogen readings of 20 percent or more). Where the allowable operating parameters cannot be achieved at a well within 15 days of initial monitoring, the collection system must be expanded within 120 days of the initial reading indicating an exceedance. Alternatively, the landfill owner/operator may submit an alternative schedule for the implementation of corrective actions.

During the June wellfield monitoring event, Well GW191 showed positive pressure reading on June 2, 2008. Wellhead adjustments were made to correct the positive pressure and remonitoring was performed within 5 days. Investigation indicated that there may be subsurface damage or plugging of the lateral causing restriction of vacuum applied to the well and therefore, the well exhibited positive pressure readings during both monitoring and re-monitoring events. Winnebago* is continuing their efforts to bring the well back into compliance for pressure. To accomplish this, Winnebago is in the process of having the

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lateral connecting the well excavated and make the necessary repair or replacement done to provide vacuum to well GW191.

Therefore, Winnebago is requesting until September 30, 2008 or 120 days of alternate compliance timeline for well GW191 from the date of the initial exceedance to continue the investigation and conduct the necessary corrective actions to bring the well into compliance.

If you have any questions, please contact Mr. Evan Buskohl at (815) 381-5649 or us at (630) 633-5520.

Sincerely,

Cornerstone Environmental Group, LLC

Sultana Hagne Sultana Haque, P.E.

Project Engineer

Khaled Mahmood, P.E.

Khaled Mah mood

Senior Project Manager

IEPA - Air Compliance Section, Bureau of Air, Springfield, Illinois cc:

> Peoria Regional Office - IEPA, Bureau of Air Evan Buskohl - Winnebago Reclamation Service



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